



PROGRESS REPORT NO. 192

TO: Bonnie Arthur, U.S. Environmental Protection Agency (EPA) – via electronic mail
Robert Tan, EPA – via electronic mail

FROM: Denise Mills, Teck American Incorporated (TAI)

Cc: Kris McCaig, TAI – via electronic mail
Rob Orr, TAI – via electronic mail

DATE: July 13, 2022

FILE NO: 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study (RI/FS) –
Progress Report No. 192, Month Ending June 2022

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Soil Amendment Technology Evaluation Study (SATES)

- TAI submitted the draft interim data summary report (IDSR), which provides the data collected during the first year of field work completed for SATES Phases III and IV, to EPA and the SATES team for review on March 29, 2022. TAI led a call on April 19, 2022 that was focused on a review of the data collected and preliminary analysis of the results obtained to date. A technical call with EPA's SATES research team was held on June 13, 2022 to review and discuss the 2021 sampling results. As of this writing, TAI has received comments from the Citizens for a Clean Columbia on both the IDSR and the statistical analysis summary on July 1, 2022. TAI and EPA have agreed that comments on the IDSR will be addressed in the full DSR that will be prepared after all the field test data are available.
- TAI will conduct the second round of 2022 soil sampling for the field test between July 18 and July 21, 2022.
- On June 16, 2022, TAI received the Research Permit from the Confederated Tribes of the Colville Reservation for the continuing field-scale testing on tribal allotments. TAI's access to and use of the test plots on the tribal allotments is authorized under the Bureau of Indian Affairs Right-of-Way Permit issued on August 15, 2017.

Upland Baseline Ecological Risk Assessment (BERA)

- TAI received EPA's comments on the June 24, 2021 pre-draft terrestrial BERA (the Draft Interim Partial [IP] Upland BERA) on March 11, 2022 and submitted responses on April 18, 2022. TAI and EPA held technical calls on May 12, June 8, and June 15, 2022 to discuss specific topics included in TAI's April 18, 2022 responses. TAI is awaiting EPA's feedback on the responses to comments.
- Upland BERA data set – During a technical call with TAI on June 8, 2022, EPA has determined that none of the 2005 data should be used in the Upland BERA and approved the Upland BERA dataset on June 17, 2022
- TAI received Upland Lakes/Emergent Wetlands study questions and scope outline with expectations for an upland lakes study on May 6, 2022. During a management call on June 1, 2022, TAI and EPA discussed the suggested scope, EPA's proposal to designate a separate upland lakes operable unit to provide a framework for the study, and EPA's rationale for its determination that this additional study is necessary. These discussions continued through June.

Aquatic BERA – As follow up to recent correspondence and a conference call between TAI and EPA regarding the data useability assessment for the aquatic BERA, EPA asked to see an updated aquatic BERA data summary table similar to Table 4-1 in the draft IP Upland BERA. TAI agreed and will provide the data summary to EPA in August.

TAI received Sediment Transport Study Questions from EPA on April 29, 2022 and is reviewing the questions in preparation for call with EPA technical team in July to discuss TAI's proposed approach for sediment transport modeling.

Upland RI Report – TAI received EPA's final comments on the pre-draft RI report (Draft IP Upland RI Report) on April 1, 2022. TAI submitted a written responses to comments on July 1, 2022.

2019 Phase 3 Sediment Study:

- Draft Phase 3 Sediment Study Data Analyses Technical Memorandum – TAI received EPA's comments on the draft technical memorandum via email on March 4, 2022. TAI reviewed the comments and identified several comments and topics for discussion with EPA for further clarification and to work toward a proposed resolution of those comments. A series of technical calls were held between TAI and EPA during April through June to discuss the comments and possible additional analyses. As of this writing, TAI has scheduled a follow-up call with EPA on July 20, 2022 to present and discuss the results of the additional bioassay data analyses requested by EPA.

- EPA Split Sample Reports

- Split Sediment and Porewater Chemistry Analyses, EPA Data Validation and Comparison Report –TAI received an email from EPA on June 6, 2022, stating that there are not significant changes that EPA can make to their August 11, 2021 revised draft interlaboratory split sample comparison and evaluation memorandum. TAI responded via email on June 24, 2022, summarizing its comments submitted on September 7, 2021, and noted that errors in the report should be corrected and discrepancies addressed before the memo is finalized.
- Split Sample Bioassay Testing, EPA Data Verification and Validation Report for the U.S. Geological Survey Columbia Environmental Research Center (CERC) chemistry data –TAI received an email from EPA on June 6, 2022, stating that there are not significant changes that EPA can make to their January 31, 2022 revised draft split bioassay porewater chemistry data verification and validation report. TAI responded via email on June 24, 2022, summarizing its previous comments regarding incomplete documentation and discrepancies in the documentation that should be addressed before the memo is finalized.
- Split Sample Bioassay Testing, EPA Interlaboratory Split Sample Bioassay Comparison Memo – TAI received a revised draft split bioassay comparison memo and response to TAI comments from EPA May 12, 2022. On June 27, 2022, TAI provided final comments on the revised draft memo.

Schedule Discussions – During the month, TAI participated in two facilitated calls on June 10 and June 14, 2022 with EPA and a facilitator, continuing the discussion from May. On June 11, 2022, TAI submitted draft schedule tables for both the Aquatic and Upland RI/FS deliverables (based on Gantt charts dated May 20, 2022) for discussion on the June 14 call. TAI received an alternate schedule for the Aquatic deliverables from EPA on June 17, 2022 and, as of this writing, an alternate schedule for the Upland deliverables on July 5, 2022.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4515.